



UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

TYRON JACKSON,

Defendant.

NO. CR21-5287-RJB

MOTION FOR DETENTION

The United States moves for pretrial detention of the Defendant, pursuant to 18 U.S.C. 3142(e) and (f)

1. **Eligibility of Case.** This case is eligible for a detention order because this case involves (check all that apply):

- ☒ Crime of violence (18 U.S.C. 3156).
- ☐ Crime of Terrorism (18 U.S.C. 2332b (g)(5)(B)) with a maximum sentence of ten years or more.
- ☒ Crime with a maximum sentence of life imprisonment or death.
- ☐ Drug offense with a maximum sentence of ten years or more.

- 1 ☐ Felony offense and defendant has two prior convictions in the four  
2 categories above, or two State convictions that would otherwise fall within  
3 these four categories if federal jurisdiction had existed.
- 4 ☐ Felony offense involving a minor victim other than a crime of violence.
- 5 ☐ Felony offense, other than a crime of violence, involving possession or use  
6 of a firearm, destructive device (as those terms are defined in 18 U.S.C.  
7 921), or any other dangerous weapon.
- 8 ☐ Felony offense other than a crime of violence that involves a failure to  
9 register as a Sex Offender (18 U.S.C. 2250).
- 10 ☒ Serious risk the defendant will flee.
- 11 ☐ Serious risk of obstruction of justice, including intimidation of a  
12 prospective witness or juror.

13 2. **Reason for Detention.** The Court should detain defendant because there  
14 are no conditions of release which will reasonably assure (check one or both):

- 15 ☒ Defendant's appearance as required.
- 16 ☒ Safety of any other person and the community.

17 3. **Rebuttable Presumption.** The United States will invoke the rebuttable  
18 presumption against defendant under 3142(e). The presumption applies because:

- 19 ☐ Probable cause to believe defendant committed offense within five years of  
20 release following conviction for a qualifying offense committed while on  
21 pretrial release.
- 22 ☐ Probable cause to believe defendant committed drug offense with a  
23 maximum sentence of ten years or more.
- 24 ☐ Probable cause to believe defendant committed a violation of one of the  
25 following offenses: 18 U.S.C. 924(c), 956 (conspiracy to murder or  
26 kidnap), 2332b (act of terrorism), 2332b(g)(5)(B) (crime of terrorism).
- 27
- 28

- ☐ Probable cause to believe defendant committed an offense involving a victim under the age of 18 under 18 U.S.C. 1591, 2241, 2242, 2244(a)(1), 2245, 2251, 2251A, 2252(a)(1) through 2252(a)(3), 2252A(a)(1) through 2252A(a)(4), 2260, 2421, 2422, 2423 or 2425.

4. **Time for Detention Hearing.** The United States requests the Court conduct the detention hearing:

- ☒ At the initial appearance
- ☐ After a continuance of \_\_\_\_ days (not more than 3)

DATED this 3rd day of September, 2021.

Respectfully submitted,

TESSA M. GORMAN  
Acting United States Attorney

/s/ Rebecca Cohen  
REBECCA COHEN  
Assistant United States Attorney